UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

SARAH THRUL f/k/a SARAH TEWALT, :

Plaintiff,

riailitiii, .

v. : Civil Action No. 3:15-cv-623

LANDMARK PROPERTY SERVICES, INC., et al.

Defendants.

MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME

The Plaintiff, by counsel, respectfully submits this memorandum of law in support of her Motion for an Extension of Time to file her reply brief to this Court's Order. (Docket No. 16).

On December 14, 2015, this Court entered an Order directing Plaintiff to Show Cause and setting a briefing schedule. The Court's Order directed Plaintiff to file her reply brief no later than January 18, 2016. As January 18, 2016 was a federal holiday, Plaintiff's reply brief is currently due no later than Tuesday, January 19, 2016. Fed. R. Civ. P. 6(a)(1)(C). Plaintiff has diligently been working on her reply. However, Plaintiff's Counsel has been participating in an all-day mediation session with Retired U.S. Court of Appeals Judge Stanley F. Birch, Jr. today in Atlanta, Georgia. This mediation—regarding *Jenkins v. Equifax Information Services, LLC* (assigned to Judge Lauck)—is still in session as of this filing. This, in addition to briefing deadlines over the last week (including in the *Dreher* and *Henderson v. First Advantage* cases) and the federal holiday, requires Plaintiff to seek a short, one-day extension to file her reply brief—until Wednesday, January 20, 2016. This extension will allow Plaintiff to fully respond to

all of the issues raised by MTG Process Servers, LLC's memorandum. The time for the Plaintiff to file her reply brief has not yet expired and thus the motion is timely made. L.R. 7(F)(2).

The extension is not sought for a dilatory purpose and would serve the interest of justice. Therefore, good cause is shown for granting the short extension of time to file Plaintiff's reply brief regarding this Court's Order until Wednesday, January 20, 2016.

Respectfully submitted, SARAH THRUL f/k/a SARAH TEWALT

By:	/s/	
-	Of Counsel	

Leonard A. Bennett, VSB No. 37523

Counsel for the Plaintiff

CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1-A

Newport News, VA 23601

Tel: (757) 930-3660 Fax: (757) 257-3450

Email: lenbennett@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2016, I electronically filed the foregoing document using the Court's CM/ECF system, which sent notification of such filing to:

Donald E. Morris Law Office of Antony K. Jones 3957 Westerre Pkwy, Suite 320 Richmond, VA 23233

Tel: 804-934-2682 Fax: 312-894-3548

Email: donald.morris@cna.com

Kenneth C. Hirtz Law Offices of Roya Palmer Ewing 3957 Westerre Pkwy, Suite 214 Richmond, VA 23233

Tel: (804) 934-2647 Fax: (312) 894-3548

Email: kenneth.hirtz@cna.com

Counsel for Landmark Property Services, Inc.

James L. Hoyle Kalbaugh Pfund & Messersmith PC 901 Moorefield Park Dr., Suite 200 Richmond, VA 23236

Tel: (804) 521-6446 Fax: (804) 320-6312

Email: lee.hoyle@kpmlaw.com

Counsel for Renaissance Mayfair, LP

/s/

Leonard A. Bennett, VSB No. 37523 Counsel for the Plaintiff CONSUMER LITIGATION ASSOCIATES, P.C. 763 J. Clyde Morris Blvd., Suite 1-A Newport News, VA 23601

Tel: (757) 930-3660 Fax: (757) 257-3450

Email: lenbennett@clalegal.com